EXHIBIT 50

Highly Confidential - Subject to Further Confidentiality Review

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 2      `         IN THE UNITED STATES DISTRICT COURT

 3            FOR THE NORTHERN DISTRICT OF OHIO

 4                   EASTERN DIVISION

 5      -----------------------------X

        IN RE: NATIONAL PRESCRIPTION   MDL No. 2804

 6      OPIATE LITIGATION,

                                   Case No. 17-MD-2804

 7      This document relates to:

 8      All Cases                    Hon. Dan A. Polster

 9      -----------------------------X

10               * HIGHLY CONFIDENTIAL *

11      * SUBJECT TO FURTHER CONFIDENTIALITY REVIEW   *

12                VIDEOTAPED DEPOSITION

13                        OF

14                 LACEY R. KELLER

15               New York, New York

16             Thursday, June 13, 2019

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        Reported by:

24      ANNETTE ARLEQUIN, CCR, RPR, CRR, RSA

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 2          Q.    "And that the monthly mean was

 3     refreshed periodically."

 4                Do you see that as well?

 5          A.    I do see that.

 6          Q.    Which you understood to mean that

 7     "The mean and standard deviation were

 8     calculated approximately twice per year

 9     using the most recent six months of data."

10                Do you see that?

11          A.    I do see that.

12          Q.    When you say "six months of

13     data," what data are you referring to?

14          A.    So that would be the chargeback

15     data that it would be applied to.

16          Q.    And so your understanding is that

17     the system, excuse me, that the monthly

18     mean was refreshed periodically and that

19     the mean and standard deviation were

20     calculated approximately twice per year

21     using the most recent six months of

22     chargeback data?

23          A.    So we applied it to the

24     chargeback data.  And so when we're making

25     this assumption, we're assuming that the
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2   most recent six months, so let's say we're

3   doing the report on -- let's make it easy

4   on myself -- on February would be like

5   January and then the preceding six months

6   to that. And then that block would be

7   refreshed to include the next six months.

8   Q.   Okay. Did you review any orders

9   that Teva had received?

10   A.   Any orders that Teva had

11   received...

12   Not unless they appeared in the

13   chargeback data.

14   Q.   And did you review any data that

15   Teva had about its orders that was

16   available to Teva at the time the orders

17   were made?

18   A.   No. That would be outside of

19   this report.

20   Q.   Did you determine whether the

21   Teva transactions flagged by your various

22   metrics, by various metrics in your report

23   were also flagged by the Teva defendants'

24   SOM systems?

25   MS. CONROY: Objection.

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 2            A.    I would not know.

 3            Q.    Did you look to see if those

 4     transactions were flagged by those systems?

 5                 MS. CONROY:  Objection.

 6            A.    Again, I wouldn't know.  It was

 7     not asked of me.

 8            Q.    And so you did not review any

 9     documents regarding investigations of

10     pended orders in those systems; is that

11     accurate?

12            A.    Not that I can recall.  That

13     would have been outside of my expertise to

14     review those.

15            Q.    I know we discussed this a little

16     bit before, but I want to make it clear for

17     the record.

18                 On page 9 of your report, in

19     paragraph 22, you say that "The report

20     focuses specifically and exclusively on

21     manufacturers' anti-diversion and

22     suspicious order monitoring programs,"

23     correct?

24            A.    Correct, it does state those

25     words.
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 2   Q.   And is that what you were

 3   endeavoring to offer an opinion on, the

 4   suspicious order monitoring programs?

 5   MS. CONROY: Objection.

 6   A.   No. I think as we stated

 7   earlier, and it's my intention to answer

 8   this the same as I have before, but I was

 9   asked to apply the known compliance metrics

10   to labelers' data including chargebacks and

11   IQVIA data.

12   Q.   Okay. So you're not offering any

13   opinions today that the Teva defendants

14   failed to flag a potentially suspicious

15   order, correct?

16   A.   Correct.

17   MS. CONROY: Objection.

18   A.   Outside of my scope.

19   Q.   Similarly, you're not offering

20   any opinions today or in your report that

21   the Teva defendants failed to detect and

22   report a suspicious order, correct?

23   A.   Correct. That would be outside

24   of my expertise.

25   MR. HAMMOUD: All right. That's